

To: Montana Department of Labor
Marilyn Kelly-Clark
Lisa Addington

From: Gregory A. Noose, Chief, Records and Driver Control Bureau

Re: SSN Verification

Date: March 15, 2007

At your request, this message confirms the discussion that we had this morning in regards to SSN verification for occupational licensing requirements that may be enacted on behalf of the Montana Department of Labor (DOL).

The Motor Vehicle Division of the Montana Department of Justice does maintain a headquarters-based capability for verifying social security numbers that are submitted for specific purposes defined in law.

The SSN verification process is a tightly regulated process that is restricted by federal law and managed by the Motor Vehicle Division in accordance with changes to state laws that are driven by federal requirements.

The process is primarily controlled by the specific terms of memos of agreement that have enacted between the Motor Vehicle Division, the Social Security Administration (SSA) and the American Association of Motor Vehicle Administrators (AAMVA). An SSA Security Policy also applies to the Motor Vehicle Division and this policy ultimately controls how our Division may acquire, utilize, release and audit the information and indicators that are provided to the Division by the SSA.

The current verification process is limited by federal requirements for driver licensing, especially commercial driver licensing, and that Help America to Vote Act (HAVA) that is managed by the Montana Secretary of State.

A social security number collected by the Motor Vehicle Division is defined in law as highly restricted personal information. Because of this, our Division is bound to limit disclosure of both the number and the associated indicators that result from authorized verification.

This morning, you mentioned that you talked to Jan Collins, the SSA Data Exchange Coordinator in Denver who manages information exchanges for Montana. Ms Collins is the same person that oversees our Motor Vehicle Division SSN verification processes. Her interpretation that an SSN verification process for the Department of Labor cannot be "piggybacked" onto the Department of Justice driver license - HAVA agreement is consistent with the operational limitations that Ms. Collins has placed upon our Division in the past.

In response to your request, it is my interpretation that SSN verification for DOL occupational licensing would have to be managed separately from driver licensing via new memos of agreement and authorized operational processes that are established between DOL and SSA. If you have further questions, I will try to route these through our Division Administrator.

Thank you - GNoose

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